

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2021-192-E

In re:

Dominion Energy South Carolina,
Incorporated Coal Retirement Docket
Opened Pursuant to Commission Order
No. 2021-418

**SIERRA CLUB'S FOURTH SET
OF DATA REQUESTS
April 1, 2022**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. ("Dominion" or the "Company") in the above referenced consolidated dockets. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

INSTRUCTIONS

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
(i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to COVID-19 and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild	bguild@mindspring.com
Dorothy E. Jaffe	dori.jaffe@sierraclub.org
Justin Somelofske	justin.somelofske@sierraclub.org

DEFINITIONS

1. The “Company” is defined to include both Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications, any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..
5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business

affiliation if a natural person, and corporate or other status and address if not a natural person.

“Identify” or “identity” when used in reference to a document means to state the following as to each document:

- a. Its nature and contents;
 - b. Its date;
 - c. The date it was executed if different from the date it bears;
 - d. The name, address and position of its author or signer;
 - e. The name, address and position of its addressee, if any;
 - f. Its present location and the name, present address and position of the person or persons having present custody; and
 - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
 7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
 8. “You” or “your” means the Company and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of the Company.

DATA REQUESTS

Request No. 4-1. Reference the Company’s Response to Sierra Club Request 2-9 where you state: “DESC has committed in its filings with South Carolina Department of Health and Environmental Control (“SC DHEC”) to pursue a treat-and-discharge approach to FGD wastewater at Williams Station. Coupled with the need for ash handling modifications at Williams,

the Company has requested a compliance date for both ash handling and FGD wastewater of 12/31/2025.”

- a. Please provide all “filings” to SCDHEC regarding the treat-and-discharge approach to FGD wastewater at Williams Stations.

Request 4-2. To the extent not provided in 4-1, please provide a copy of the Williams Station’s current NPDES Permit, Permit No. SC0003883.

Request 4-3. To the extent not provided in 4-1, please provide a copy of the Company’s renewal application associated with NPDES Permit No. SC0003883, which expired on December 31, 2021, and any documents or correspondence with SCDHEC related to the above-mentioned permit renewal application for Permit No. SC0003883.

Request 4-4. Reference Williams Station NPDES Permit No. SC0003883, Part V.A 9, page 37. To the extent not provided in 4-1, please provide the applicability study “outlining the results of evaluations conducted to determine appropriate and effective treatment strategies and the detailed applicability schedules for meeting the limits and requirements of the final ELG rule.”

Request 4-5. Reference the Company’s response to Sierra Club 2-8(a) where the Company answered “No” to the question of “Did the Company file a Notice of Planned Participation with the South Carolina Department of Health and Environmental Control under 40 C.F.R. §§ 423.19(e), 423.19(f) or 423.19(h) for the Williams Plant.” Please provide all communications and documents leading to the Company’s decision to not file a Notice of Planned Participation.

For Requests 4-6 through 4-10, reference the Company’s Response to Sierra Club 2-8(b): “Given the 12/31/2025 compliance deadline for FGD Wastewater under the ELG rule, the

Company is undertaking compliance projects at Williams Station to facilitate operation past 12/31/2025.” (Hereinafter referred to as “ELG compliance project”).

Request 4-6. Provide a timeline of the Williams Station ELG compliance project that includes the following:

- a. A list of required permits, the administering agency, and the approval dates (or application date if permit is pending).
- b. The date on which the Company’s management officially approved the decision to move forward with complying with the ELGs by December 31, 2025.
- c. The date on which the Company began work to comply with the ELGs.
- d. Any anticipated construction milestones or RFP issuances prior to completion of the ELG compliance project.
- e. The date the Company anticipates all work on the ELG compliance project will be completed.

Request 4-7. Produce all reports, PowerPoint presentations, and meeting minutes (both internal and public) that the Company created that discuss the timeline, the cost, the phases, the approval process, and any other details of the ELG compliance project.

Request 4-8. Produce all reports, PowerPoint presentations, and meeting minutes (both internal and public) that the Company created to gain approval from Company management for the ELG compliance project.

Request 4-9. Produce all reports, PowerPoint presentations, and meeting minutes (both internal and public) that the Company created to provide updates to Company management on the status of the ELG compliance project.

Request 4-10. Provide a chart or diagram that explains the decision-making process that the Company uses to decide whether to move forward with a new capital or environmental project, such as the ELG compliance project.

Respectfully submitted this 1st day of April, 2022.

A handwritten signature in black ink, appearing to read 'D. Jaffe', with a horizontal line extending to the right.

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CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2021-192-E, listed below, a copy of the Sierra Club's Fourth Set of Data Requests via electronic mail on this day, April 1, 2022.

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